

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

SALVADORA ORTIZ and THOMAS SCOTT,

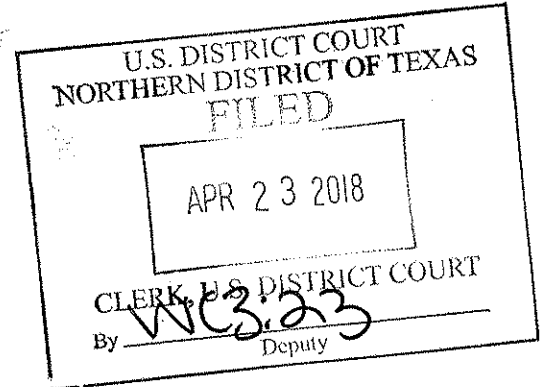
Plaintiffs,

v.

AMERICAN AIRLINES, INC., The  
AMERICAN AIRLINES PENSION ASSET  
ADMINISTRATION COMMITTEE, and  
AMERICAN AIRLINES FEDERAL CREDIT  
UNION,

Defendants.

Case No.: 4:16-CV-00151-A



**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 23 and this Court's Order dated March 23, 2018 (Dkt. No. 87), Plaintiffs Salvadora Ortiz and Thomas Scott ("Plaintiffs") hereby move this Court for an order certifying the following proposed class in this action (or in the alternative, such other class(es) as the Court may determine to be appropriate):

All participants and beneficiaries of the Super Saver, a 401(k) Capital Accumulation Plan for Employees of Participating AMR Corporation Subsidiaries, who invested directly in the AA Credit Union Fund or who indirectly invested in the AA Credit Union Fund by virtue of their investment in the Moderate Pre-Mixed Portfolio or the Conservative Pre-Mixed Portfolio at any time from February 12, 2010 through the date of judgment, excluding the (i) Directors and elected officers of Defendant American Airlines; (ii) the members of the PAAC; the members of any other committee exercising fiduciary responsibility or authority with respect to the Plan, including the Benefits Strategy Committee and the Pension Benefits Administration Committee; and the Directors and elected officers of Defendant AA Credit Union.

In addition, Plaintiffs also move the Court to appoint Plaintiffs as the class representatives for the class, and Plaintiffs' counsel, Schneider Wallace Cottrell Konecky Wotkyns LLP and Friedman Suder & Cooke, PC, as class counsel.

This Motion is made based upon the accompanying Memorandum of Law and the Declarations of Todd M. Schneider, Jonathan T. Suder, Jack DeWitt, Roger Levy, James King, Salvador Ortiz and Thomas Scott, Jr., as well as the arguments of counsel, Plaintiffs' Complaint (Dkt. No. 1), all other papers, pleadings, documents, and materials filed in this action, and any other evidence and argument the Court may consider.

Dated: April 23, 2018

Respectfully submitted,



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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on April 23, 2018, I conferred with Shannon Barrett (on behalf of the Defendants American Airlines, Inc. and the American Airlines Pension Asset Administration Committee), and Jonathan Neerman (on behalf of the American Airlines Federal Credit Union) and Defendants are opposed to the relief sought in this Motion.

  
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Todd I. Blumenfeld

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served via the Court's electronic ECF system on April 23, 2018 on all counsel of record as follows:


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